

Name: TODD MICHAEL SCHULTZ

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In Pro Per

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TODD MICHAEL SCHULTZ

Plaintiff

MICHAEL C. THOMPSON

GREGORY R. HOLMES

YOUTUBE LLC

Defendant(s).

CASE NUMBER:

2:23-CV-03452-JAK-MRWx

To be supplied by the Clerk of
The United States District Court

**MOTION TO REMAND CASE TO
STATE COURT AT STANLEY
MOSK COURTHOUSE**

Please take notice that Plaintiff, Todd Michael Schultz, in Pro Per, requests that this court, which has provided a 30 day stay as a time period to have the current action, which has been deemed outside the subject-matter jurisdiction of the District Court of Los Angeles. In order to maintain the expedience of the process, Plaintiff requests that the case, currently, dismissed without prejudice for lack of subject-matter jurisdiction - but a 30 day Stay is provided for the action requested in this motion.

Plaintiff asks that the case be placed at the Stanley Mosk Courthouse, which is the most convenient and appropriate courthouse for the Plaintiff to be engaged at. Furthermore, it must be determined if a "long arm statute" will apply, or any other instance where a general jurisdiction can be held over the defendants both in order to determine 230 immunity for YouTube, and

1 whatever argument Thompson and Holmes decide to put forth when jurisdiction is no longer
2 an issue. Plaintiff plans to provide the judge's analysis, the 4AC, but is willing to clarify per the
3 needs of the defendant Thompson and Holmes' representation. The consistent threats and
4 vastly inappropriate behavior from Thompson and Holmes is unlikely to find immunity and
5 there is a likelihood that a due process of this matter is vastly important to the conditions
6 existing on one of the most popular platforms on the planet, one that we trust to provide a
7 neutral or truthful or both experience from, but has proven that following their own terms of
8 service should be viewed as a courtesy, and not a legal obligation they have instigated and
9 promised by virtue of the words in it's ToS and Policy Enforcement, etc.

10 There has been very little substantive contact between counsel, and it seems the two
11 hired counsel understand ignoring my emails and inquiries as a strategically smart, given the
12 odds that a pro se litigant is going to properly find fault with their litigation privileged
13 behavior. However, Plaintiff feels strongly that all defendants will be found liable for the
14 matter described in 4AC. Plaintiff requests this motion be granted per Judge Kronstadt's filing
15 dismissing without prejudice and providing a 30 day Stay in order to do so.
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22 Dated: Wednesday June 28, 2023

23 Signed by:

24 Todd Michael Schultz
25 (Plaintiff)
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